Exhibit A

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June 25, 2024

Via Electronic Mail

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Re: *Doe 1 v. GitHub, Inc*, **Lead Case No. 4:22-cv-06823-JST**

Dear Joe:

Plaintiffs are aware that OpenAI produced documents in the *Tremblay v. OpenAI* matter. Many of those documents appear to be relevant to this case. To the extent that these documents are responsive to Plaintiffs' RFPs, Plaintiffs request that OpenAI produce them given that there is no burden in producing them given that they have already been collected and that the proportionality considerations set forth in Rule 26 support the discovery.

Plaintiffs also note that Judge Tigar's narrowing of the claims in this case does not alter the relevance of the discovery sought by Plaintiffs. Many (if not all) of the discovery requests relevant to the DMCA claims and the breach of contract claim are co-extensive (*e.g.,* the removal of CMI for training purposes and the decimation of licensed code with CMI removed underscored Plaintiffs' Section 1202 claim, but this is also, simultaneously, the conduct underscoring our allegations that Defendants breached Plaintiffs' open-source licenses). Plaintiffs are reviewing their discovery requests to determine if any were solely relevant to the DMCA claims, but in the meantime believe the parties should continue to meet and confer to move discovery along.

To that end we write to follow up on promises made by OpenAI to produce relevant documents and supplement its responses to interrogatories, as detailed below.